

DOLLY M. TROMPETER, ESQ.  
CA Bar ID No. 235784  
Peña & Bromberg, PLC  
3467 W. Shaw Ave., Ste 100  
Fresno, CA 93711  
Telephone: 415-271-8604  
Fax: 866-282-6709  
dolly@dollydisabilitylaw.com  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Valerie Ann Moroles,  
Plaintiff,

vs.

Frank Bisignano, COMMISSIONER  
OF SOCIAL SECURITY<sup>1</sup>,  
Defendant.

Case No. 1:25-cv-00809-KES-BAM  
STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 38-day extension of time, from December 2, 2025 to January 9, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

---

<sup>1</sup> Frank Bisignano became the Commissioner of Social Security on May 7, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's  
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's second request for an extension of time. Plaintiff  
4 respectfully states that the requested extension is necessary due several merit briefs  
5 being due on the same week. For the weeks of November 24, 2025 and December  
6 1, 2025, Plaintiff's Counsel has four merit briefs due and five reply briefs due.  
7 Counsel requires additional time to brief the issues thoroughly for the Court's  
8 consideration. Furthermore, this matter was recently assigned to undersigned  
9 Counsel for the plaintiff. Additionally, there are intervening holidays, including  
10 Thanksgiving Christmas and Hanukkah. Undersigned counsel also has preplanned  
11 vacation during the last two weeks of December 2025. Defendant does not oppose  
12 the requested extension. Counsel apologizes to the Defendant and Court for any  
13 inconvenience this may cause.

14  
15 Respectfully submitted,

16 Dated: November 26, 2025 PENA & BROMBERG, ATTORNEYS AT LAW  
17

18 By: /s/ Dolly M. Trompeter  
19 DOLLY M. TROMPETER  
20 Attorneys for Plaintiff  
21

22 Dated: November 26, 2025 ERIC GRANT  
23 United States Attorney  
24 MATHEW W. PILE  
25 Head of Program Litigation 1  
26 Law & Policy  
27 Social Security Administration  
28

By: \*/s/ Oscar Gonzalez de Llano  
Oscar Gonzalez de Llano

Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on November 26, 2025)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to the parties' joint stipulation (Doc. 17) and good cause having been shown, it is ORDERED that:

1. Plaintiff shall have a 38-day extension of time, from December 2, 2025 to January 9, 2025, for Plaintiff to serve Defendant with Plaintiff's Motion for Summary Judgment; and
2. All other dates in the Court's Scheduling Order (Doc. 9) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **December 1, 2025**

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE